

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

CAPELLA PHOTONICS, INC.

Plaintiff,

v.

INFINERA CORPORATION, TELLABS,
INC., TELLABS OPERATIONS INC.,
CORIANT AMERICA INC., and CORIANT
(USA) INC.,

Defendants.

Case No. 2:20-cv-00077-JRG

**DECLARATION OF CHRISTOPHER L. WANGER IN SUPPORT
OF PLAINTIFF CAPELLA PHOTONICS, INC.'S MOTION TO STRIKE
DEFENDANTS' EXPERT REPORT OF ROBERT L. STOLL**

I, Christopher L. Wanger, declare and state as follows:

1. I am a partner with Manatt, Phelps & Phillips, LLP, attorneys for plaintiff Capella Photonics, Inc. in the above-captioned action. Unless otherwise stated, I have personal knowledge of the facts set forth herein.

2. Attached hereto, as **Exhibit 1**, is a true and correct copy (without appendices) of the Expert Report of Robert L. Stoll, dated March 15, 2021, served in connection with the above-captioned action. Exhibit 1 is being filed under seal.

3. Attached hereto, as **Exhibit 2**, is a true and correct copy of relevant pages from Defendants' First Supplemental Objections and Responses to Plaintiff Capella Photonics, Inc.'s Second Set of Interrogatories (7-15), dated February 6, 2021.

I declare under penalty of perjury of the laws of the United States that the foregoing is true and correct.

Executed on April 26, 2021 at Mill Valley, California.

/s/ Christopher L. Wanger
Christopher L. Wanger

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing document was served on all counsel of record who have consented to electronic service on this 26th day of April, 2021.

/s/ Robert D. Becker
Robert D. Becker